

## NOTICE OF AMENDMENT

### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

February 17, 1998

Mr. Les Owen  
British Petroleum Exploration (Alaska)  
BP Pipelines  
900 East Benson Boulevard.  
MB 11-5  
Anchorage, Alaska 99508

**CPF NO. 58706M**

Dear Mr. Owen:

On November 20, 1997, a representative of the Western Region, Office of Pipeline Safety (OPS), pursuant to Chapter 601 of 49 United States Code, conducted an inspection of your Endicott Pipeline. The inspection also included examination of operating and maintenance procedures and records related to this pipeline.

As a result of the inspection, it appears that you have committed probable violations as noted below of pipeline safety regulations, Title 49, Code of Federal Regulations (CFR), Part 195. The following items were noted as probable violations:

1. **§195.402(c)(3) requires procedures for operating, maintaining and repairing the pipeline system in accordance with each of the requirements of subpart F to be included in the operator's pipeline manuals.**

The pipeline repair procedures in BP's Endicott Maintenance Manual are inadequate in the following ways:

- a. On page 11 under "Gouges and Grooves", the procedures should specify how gouges and grooves having a depth greater than 12½% of the nominal wall thickness will be repaired, or refer to a section of the manual where repair options for this condition are discussed.
- b. On page 11 under "Localized Corrosion", the procedures should specify how corrosion in the girth weld or longitudinal area will be repaired, or refer to a section of the manual where repair options for this condition are discussed.

- c. On page 13 under "Full-Wrap (Longitudinal Butt Weld)", a discussion describing what a full-wrap is should be included to distinguish this option from a split sleeve.
- d. On page 13 under "Full-Wrap (Longitudinal Butt Weld)", the procedure states that "Extensive pitting that cannot be covered with a 6 inch x 6 inch patch shall be repaired ...". This statement implies that a patch repair is acceptable if the pitting can be covered with a 6 inch x 6 inch patch. This is contrary to the statement on page 13 which reads "Endicott has no pipe grade other than X52; therefore, patching is not permitted."

In addition, the inspector was informed that the pipe grade of the Endicott line is X65, therefore the statement indicating the pipe is grade X52 is apparently incorrect.

- e. On page 14 under "Full-Wrap (Longitudinal Butt Weld)", limits on grinding should be specified to ensure the wall thickness of the pipe is not reduced to an unsafe level when removing gouges, grooves, arc burns and notches.
  - f. On page 15 under "Split Sleeves", a discussion of criteria to be used when determining when split sleeves will be installed for reinforcement only, versus for pressure containment, should be included.
  - g. On page 15 under "Split Sleeves", limits on grinding should be specified to ensure the wall thickness of the pipe is not reduced to an unsafe level when removing gouges, grooves, arc burns and notches.
  - h. A description of how far beyond the limits of the defect a repair sleeve must extend should be included in the appropriate sections.
2. **§195.402(c)(3) requires that the operator's manual of written procedures for conducting maintenance and normal operations include procedures for operating, maintaining and repairing the pipeline system in accordance with each of the requirements of subpart F, and**

**§195.428(a), which is in Subpart F, requires that each operator shall, at intervals not exceeding 15 months, but at least once each calendar year inspect and test each pressure limiting device, relief valve, pressure regulator or other item of pressure control equipment to determine that it is functioning properly, is in good mechanical condition and is adequate from the standpoint of capacity and reliability of operation for the service in which it is used.**

On page 26 of the Endicott Procedures Manual, a statement under "195.428 Overpressure Safety Devices" reads "Procedure: Not applicable as the Endicott Pipeline has no overpressure safety devices." This is incorrect as the Endicott pipeline has high pressure alarms and shutdown switches installed on it.

3. **§195.402(c)(3) requires that the operator's manual of written procedures for conducting maintenance and normal operations include procedures for operating, maintaining and repairing the pipeline system in accordance with each of the requirements of subpart F, and**

**§195.416(e), which is in Subpart F, requires that whenever any buried pipe is exposed for any reason, the operator shall examine the pipe for evidence of external corrosion.**

On page 20 of the Endicott Procedures Manual, a statement in section "195.416(e)" under "195.416 External Corrosion Control" reads "The Endicott Pipeline is supported above the tundra, therefore no buried pipeline will be exposed". This is misleading since while the pipeline is in fact above ground, it is insulated with 3 inches of polyurethane foam insulation which is surrounded by a 24 gauge steel jacket. On occasions when the insulation is removed from the pipe, the pipe should be examined for evidence of external corrosion and a record should be made of such inspections per 195.404(c)(3).

4. **§195.402(d)(1)(iv) requires that the operator's manual of written procedures for conducting maintenance and normal operations and handling abnormal operations and emergencies include procedures for providing safety when operating design limits have been exceeded following the operation of any safety device.**

On page 43 of the Endicott Operations Manual, a statement in the section "Operation of Safety Device" under "PIPELINE FACILITIES AND OPERATIONS - ABNORMAL OPERATIONS" reads "There are no safety valves or high-pressure shutdown devices in the pipeline system ....". This is incorrect as the Endicott pipeline has high pressure alarms and shutdown switches installed on it.

As provided in 49 CFR §190.237, this Notice serves as your notification that this office considers your procedures/plans inadequate. Under 49 CFR §190.237, you have a right to submit written comments or request an informal hearing. You must submit written comments or a request for a hearing within 30 days after receipt of this Notice. If you do not wish to contest this Notice of Amendment, you may provide your revised procedures within 30 days of receipt of this notice. After reviewing the record, the Associate Administrator for Pipeline Safety will determine whether your plans or procedures are adequate. The criteria used in making this determination are outlined in 49 CFR §190.237.

When appropriate procedures have been prepared, submit them to Director, Western Region, Research and Special Programs Administration, Office of Pipeline Safety, 12600 West Colfax Avenue, Suite A-250, Lakewood, Colorado 80215

Please refer to **CPF NO. 58706M** in any correspondence on this matter.

Sincerely,

Edward J. Ondak  
Director

Enclosure

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